

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|                                 |          |   |
|---------------------------------|----------|---|
| <b>UNITED STATES OF AMERICA</b> | <b>:</b> | <b>CRIMINAL NO. _____</b>   |
| <b>v.</b>                       | <b>:</b> | <b>DATE FILED: _____</b>  |
| <b>PATRICIA LIGHTSEY</b>        | <b>:</b> | <b>VIOLATIONS:</b>  |
| <b>JAMES HULL</b>               | <b>:</b> | <b>18 U.S.C. § 1344 (bank fraud - 1 count)</b>                        |
|                                 | <b>:</b> | <b>18 U.S.C. § 1028A(a)(1) (aggravated identity theft - 2 counts)</b> |
|                                 | <b>:</b> | <b>18 U.S.C. § 2 (aiding and abetting)</b>                            |
|                                 |          | <b>Notice of forfeiture</b>   |

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. At all times material to this indictment, TD Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation, FDIC Number 18409.

2. From in or about July 2011 to in or about April 2012, in the Eastern District of Pennsylvania and elsewhere, defendants

**PATRICIA LIGHTSEY**  
**and**  
**JAMES HULL**

knowingly executed, attempted to execute, and aided and abetted the execution of, a scheme to defraud TD Bank and to obtain monies owned by and under the care, custody, and control of TD Bank by means of false and fraudulent pretenses, representations, and promises.

It was a part of the scheme that:

3. Defendant PATRICIA LIGHTSEY, then an employee of TD Bank, illegally provided means of identification and identity information, including the names, dates of

birth, driver's license numbers, social security numbers, and bank account numbers of customers, including TD Bank business customers Anchor Moving and Storage, American Athletic Courts, Inc., Eagil Life Settlement LLC, and Westminster Mayfair Presbyterian Church, and TD Bank individual customers with the initials E.L., R.L., S.L., F.G., T.L., J.M., F.J., A.T., and L.C., to an individual unknown to the grand jury, in exchange for the promise of money.

4. The individual unknown to the grand jury who received the means of identification and identity information of the TD Bank account holders from defendant PATRICIA LIGHTSEY, and others unknown to the grand jury, recruited other individuals, including defendant JAMES HULL, to utilize the means of identification and identity information to defraud TD Bank by fraudulently accessing the bank accounts and by cashing counterfeit checks drawn on the customers' accounts.

5. Defendant JAMES HULL, and others known and unknown to the grand jury, withdrew large amounts of cash from the bank accounts of TD Bank customers whose means of identification and identity information were provided by defendant PATRICIA LIGHTSEY, including TD Bank business customers Anchor Moving and Storage, American Athletic Courts, Inc., Eagil Life Settlement LLC, and Westminster Mayfair Presbyterian Church, and TD Bank individual customers with the initials E.L., R.L., S.L., F.G., T.L., J.M., F.J., A.T., and L.C., all without their knowledge and consent by, among other methods, making cash withdrawals, and cashing counterfeit checks. In order to access the accounts, defendant HULL and others known and unknown to the grand jury were typically provided with false identification documents bearing their photographs but containing the names of the true account holders for the customer accounts provided by defendant LIGHTSEY.

**TD Bank Checking Account of Anchor Moving and Storage,**

**Account Number Ending in 8094**

6. On numerous occasions between July 15, 2011 and August 5, 2011, defendant PATRICIA LIGHTSEY, then an employee of TD Bank, accessed the account and personal information of Anchor Moving and Storage, the account holder of a TD Bank checking account ending in 8094, which defendant LIGHTSEY provided without authority to a person unknown to the grand jury prior to August 11, 2011.

7. On or about August 11, 2011, at a TD Bank branch in Middletown, New Jersey, an individual known to the grand jury cashed a counterfeit check of Anchor Moving and Storage, drawn on the TD Bank checking account of Anchor Moving and Storage ending in 8094, dated August 10, 2011, check number 414, in the amount of \$2,880.11

**TD Bank Checking Account of American Athletic Courts, Inc.,**

**Account Number Ending in 9608**

8. On numerous occasions on August 5, 2011, defendant PATRICIA LIGHTSEY, then an employee of TD Bank, accessed the account and personal information of American Athletic Courts, Inc., the account holder of a TD Bank checking account ending in 9608, which defendant LIGHTSEY provided to a person unknown to the grand jury prior to August 11, 2011.

9. On or about August 11, 2011, at a TD Bank branch in Hazlet, New Jersey, an individual known to the grand jury cashed a counterfeited check of American Athletic Courts, Inc. dated August 10, 2011, check number 20236, in the amount of \$1,733.52, from the TD Bank checking account of American Athletic Courts, Inc. ending in 9608.

10. On or about August 12, 2011, at a TD Bank branch in Spring Lake, New

Jersey, an individual known to the grand jury cashed a counterfeited check of American Athletic Courts, Inc. dated August 10, 2011, check number 20239, in the amount of \$2,116.84, from the TD Bank checking account of American Athletic Courts, Inc. ending in 9608.

**TD Bank Checking Account of E.L. and R.L., Account Number Ending in 9807**

11. On numerous occasions between July 6, 2011 and August 10, 2011, defendant PATRICIA LIGHTSEY, then an employee of TD Bank, accessed the account and personal information of E.L. and R.L., the joint account holders of a TD Bank checking account ending in 9807, which defendant LIGHTSEY provided without authority to a person unknown to the grand jury prior to August 24, 2011.

12. On or about August 24, 2011, at a TD Bank branch in Langhorne, Pennsylvania, an individual known to the grand jury cashed against the TD Bank checking account of E.L. and R.L. ending in 9608 a counterfeit check of "Lexington Equities, LLC," drawn on Valley National Bank, dated August 20, 2011, check number 1270, in the amount of \$8,226.15, made payable to E.L. At the time the individual cashed this check, the individual presented a driver's license in E.L.'s name but containing the individual's photograph.

13. On or about August 24, 2011, at a TD Bank branch in Levittown, Pennsylvania, an individual unknown to the grand jury cashed against the TD Bank checking account of E.L. and R.L. ending in 9608 a counterfeit check of "Lexington Equities, LLC," drawn on Valley National Bank, dated August 20, 2011, check number 1275, in the amount of \$7,840.20, made payable to R.L. At the time the individual cashed this check, the individual presented a driver's license in R.L.'s name but containing the individual's photograph.

14. On or about August 26, 2011, at a TD Bank branch in Newtown, Pennsylvania, an individual known to the grand jury cashed against the TD Bank checking

account of E.L. and R.L. ending in 9608 a counterfeit check of “Lexington Equities, LLC,” drawn on Valley National Bank, dated August 23, 2011, check number 1277, in the amount of \$7,826.08, made payable to E.L. At the time the individual cashed this check, the individual presented a driver’s license in E.L.’s name but containing the individual’s photograph.

**TD Bank Checking Account of S.L., Account Number Ending in 6117**

15. On numerous occasions between July 21, 2011 and August 10, 2011, defendant PATRICIA LIGHTSEY, then an employee of TD Bank, accessed the account and personal information of S.L., the account holder of a TD Bank checking account ending in 6117, which defendant LIGHTSEY provided without authority to a person unknown to the grand jury prior to August 24, 2011.

16. On or about August 24, 2011, at a TD Bank branch in Metuchen, New Jersey, an individual unknown to the grand jury deposited into the TD Bank checking account of S.L. ending in 6117 a counterfeit check of “GIC Built” drawn on JP Morgan Chase Bank, dated August 20, 2011, check number 243, in the amount of \$8,628.07, made payable to S.L., and then withdrew \$3,250 cash from the TD Bank checking account of S.L. ending in 6117. At the time the individual withdrew this cash, the individual presented a driver’s license in S.L.’s name but containing the individual’s photograph.

**TD Bank Checking Account of F.G., Account Number Ending in 6011**

17. On numerous occasions between July 21, 2011 and August 1, 2011, defendant PATRICIA LIGHTSEY, then an employee of TD Bank, accessed the account and personal information of F.G., the account holder of a TD Bank checking account ending in 6011, which defendant LIGHTSEY provided without authority to a person unknown to the grand jury prior to September 9, 2011.

18. On or about September 9, 2011, at a TD Bank branch in Plymouth Meeting, Pennsylvania, defendant JAMES HULL deposited into the TD Bank checking account of F.G. ending in 6011 a counterfeit check of “The Entrust Group” drawn on Union Bank, dated September 4, 2011, check number 88377, in the amount of \$19,340.72, made payable to F.G., and simultaneously withdrew \$11,000 cash from the TD Bank checking account of F.G. ending in 6011. At the time he deposited this check and withdrew this cash, defendant HULL presented a New Jersey driver’s license in F.G.’s name but containing defendant HULL’s photograph.

19. On or about September 10, 2011, at a TD Bank branch in Devon, Pennsylvania, defendant JAMES HULL deposited into the TD Bank checking account of F.G. ending in 6011 a counterfeit check of “The Catholic Charities Diocese of Trenton” drawn on Wells Fargo Bank, dated September 8, 2011, check number 119704, in the amount of \$14,735.70, made payable to F.G., and simultaneously withdrew \$9,000 cash from the TD Bank checking account of F.G. ending in 6011. At the time he deposited this check and withdrew this cash, defendant HULL presented a New Jersey driver’s license in F.G.’s name but containing defendant HULL’s photograph.

20. On or about September 10, 2011, at a TD Bank branch in Devon, Pennsylvania, defendant JAMES HULL attempted to withdraw \$8,500 from the TD Bank checking account of F.G. ending in 6011. At the time he attempted to withdraw this cash, defendant HULL presented a New Jersey driver’s license in F.G.’s name but containing defendant HULL’s photograph.

21. On or about September 10, 2011, at a TD Bank branch in Devon, Pennsylvania, defendant JAMES HULL attempted to withdraw \$4,300.50 cash from the TD Bank checking account of F.G. ending in 6011. At the time he attempted to withdraw this cash,

defendant HULL presented a New Jersey driver's license in F.G.'s name but containing defendant HULL's photograph.

**TD Bank Checking Account of T.L., Account Number Ending in 6327**

22. On numerous occasions between July 21, 2011 and August 17, 2011, defendant PATRICIA LIGHTSEY, then an employee of TD Bank, accessed the account and personal information T.L., the account holder of a TD Bank checking account ending in 6327, which defendant LIGHTSEY provided without authority to a person unknown to the grand jury prior to September 9, 2011.

23. On or about September 9, 2011, at a TD Bank branch in Hatboro, Pennsylvania, defendant JAMES HULL deposited into the TD Bank checking account of T.L. ending in 6327 a counterfeit check of "The Catholic Charities Diocese of Trenton" drawn on Wells Fargo Bank, dated September 8, 2011, check number 119672, in the amount of \$13,258.25, made payable to T.L., and simultaneously withdrew \$8,000 cash from the TD Bank checking account of T.L. ending in 6327. At the time he deposited this check and withdrew this cash, defendant HULL presented a New Jersey driver's license in T.L.'s name but containing defendant HULL's photograph.

24. On or about September 9, 2011, at a TD Bank branch in Hatboro, Pennsylvania, an individual unknown to the grand jury withdrew \$9,263 cash from the TD Bank checking account of T.L. ending in 6327. At the time the individual withdrew this cash, the individual presented a driver's license in T.L.'s name but containing the individual's photograph.

25. On or about September 10, 2011, at a TD Bank branch in Haverford, Pennsylvania, defendant JAMES HULL deposited into the TD Bank checking account of T.L. ending in 6327 a counterfeit check of "The Entrust Group" drawn on Union Bank, dated

September 6, 2011, check number 88611, in the amount of \$16,829.40, made payable to T.L.

26. On or about September 10, 2011, at a TD Bank branch in Radnor, Pennsylvania, defendant JAMES HULL deposited into the TD Bank checking account of T.L. ending in 6327 a counterfeit check of “The Entrust Group” drawn on Union Bank, dated September 6, 2011, check number 88583, in the amount of \$26,080.50, made payable to T.L., simultaneously withdrew \$11,000 cash from the TD Bank checking account of T.L. ending in 6327, and then subsequently withdrew another \$8,500 cash from the TD Bank checking account of T.L. ending in 6327. At the time he deposited this check and withdrew this cash, defendant HULL presented a New Jersey driver’s license in T.L.’s name but containing defendant HULL’s photograph.

27. On or about September 10, 2011, at a TD Bank branch in Haverford, Pennsylvania, defendant JAMES HULL attempted to withdraw \$9,000 cash from the TD Bank checking account of T.L. ending in 6327. At the time he attempted to withdraw this cash, defendant HULL presented a New Jersey driver’s license in T.L.’s name but containing defendant HULL’s photograph.

28. On or about January 14, 2012, at a TD Bank branch in Laurel, Maryland, an individual unknown to the grand jury deposited into the TD Bank checking account of T.L. ending in 6327 a counterfeit check of “Geico General Insurance Company” drawn on Bank of America, dated January 11, 2012, check number 618835474, in the amount of \$12,038.52, made payable to T.L., and then separately withdrew \$5,000 cash and \$3,308.20 cash (for a total of \$8,308.20) from the TD Bank checking account of T.L. ending in 6327. Each time the individual withdrew this cash, the individual presented a New Jersey driver’s license in T.L.’s name but containing the individual’s photograph.



**TD Bank Checking Account of Eagil Life Settlement LLC,**

**Account Number Ending in 4310**

29. On numerous occasions on September 27, 2011, defendant PATRICIA LIGHTSEY, then an employee of TD Bank, accessed the account and personal information of Eagil Life Settlements LLC, the account holder of a TD Bank checking account ending in 4310, which defendant LIGHTSEY provided without authority to a person unknown to the grand jury prior to October 3, 2011.

30. On or about October 3, 2011, at a TD Bank branch in East Rutherford, New Jersey, an individual unknown to the grand jury cashed a counterfeited check of Eagil Life Settlements LLC dated September 28, 2011, check number 3037, in the amount of \$1,729.40, from the TD Bank checking account of Eagil Life Settlements LLC ending in 4310.

31. On or about October 3, 2011, at a TD Bank branch in Springfield, New Jersey, an individual unknown to the grand jury cashed a counterfeited check of Eagil Life Settlements LLC dated September 30, 2011, check number 3042, in the amount of \$1,835.23, from the TD Bank checking account of Eagil Life Settlements LLC ending in 4310.

32. On or about October 3, 2011, at a TD Bank branch in Matawan, New Jersey, an individual unknown to the grand jury cashed a counterfeited check of Eagil Life Settlements LLC dated September 30, 2011, check number 3047, in the amount of \$2,441.60, from the TD Bank checking account of Eagil Life Settlements LLC ending in 4310.

33. On or about October 3, 2011, at a TD Bank branch in Wallington, New Jersey, an individual unknown to the grand jury cashed a counterfeited check of Eagil Life Settlements LLC dated September 29, 2011, check number 3043, in the amount of \$914.20, from the TD Bank checking account of Eagil Life Settlements LLC ending in 4310.

34. On or about October 4, 2011, at a TD Bank branch in Holmdel, New Jersey, an individual unknown to the grand jury cashed a counterfeited check of Eagil Life Settlements LLC dated September 30, 2011, check number 3045, in the amount of \$1,420.18, from the TD Bank checking account of Eagil Life Settlements LLC ending in 4310.

**TD Bank Checking Account of J.M., Account Number Ending in 5226**

35. On numerous occasions between September 9, 2011 and September 28, 2011, defendant PATRICIA LIGHTSEY, then an employee of TD Bank, accessed the account and personal information of J.M., the account holder of a TD Bank checking account ending in 5226, which defendant LIGHTSEY provided without authority to a person unknown to the grand jury prior to October 18, 2011.

36. On or about October 18, 2011, at a TD Bank branch in Milford, Connecticut, an individual known to the grand jury deposited into the TD Bank checking account of J.M. ending in 5226 a counterfeit check of “Gasiorowski & Holobinko” drawn on Two Rivers Community Bank, dated October 5, 2011, check number 10089, in the amount of \$18,072.14, made payable to J.M., and then withdrew \$8,500 cash from the TD Bank checking account of J.M. ending in 5226. At the time the individual withdrew this cash, the individual presented a driver’s license in J.M.’s name but containing the individual’s photograph.

37. On or about October 18, 2011, at a TD Bank branch in Glastonbury, Connecticut, an individual known to the grand jury deposited into the TD Bank checking account of J.M. ending in 5226 a counterfeit check of “Genpro, Inc.” drawn on Sun National Bank, dated October 4, 2011, in the amount of \$12,733.93, made payable to J.M.

**TD Bank Checking Account of F.J., Account Number Ending in 4428**

38. On numerous occasions between April 13, 2011 and August 10, 2011, defendant PATRICIA LIGHTSEY, then an employee of TD Bank, accessed the account and personal information of F.J., the account holder of a TD Bank checking account ending in 4428, which defendant LIGHTSEY provided without authority to a person unknown to the grand jury prior to October 18, 2011.

39. On or about October 18, 2011, at a TD Bank branch in New Haven, Connecticut, an individual known to the grand jury deposited into the TD Bank checking account of F.J. ending in 4428 a counterfeit check of “Genpro, Inc.” drawn on Sun National Bank, dated October 4, 2011, in the amount of \$17,420.18, made payable to F.J., and then withdrew \$8,500 cash from the TD Bank checking account of F.J. ending in 4428. At the time the individual withdrew this cash, the individual presented a New Jersey driver’s license in F.J.’s name but containing the individual’s photograph.

40. On or about October 18, 2011, at a TD Bank branch in New Haven, Connecticut, an individual known to the grand jury withdrew \$8,500 in the form of an official TD Bank check, number 40348099-1, from the TD Bank checking account of F.J. ending in 44428. At the time the individual withdrew this money, the individual presented a driver’s license in F.J.’s name but containing the individual’s photograph.

**TD Bank Checking Account of A.T., Account Number Ending in 0629**

41. On numerous occasions on September 21, 2011, defendant PATRICIA LIGHTSEY, then an employee of TD Bank, accessed the account and personal information A.T., the account holder of a TD Bank checking account ending in 0629, which defendant LIGHTSEY provided without authority to a person unknown to the grand jury prior to February 7, 2012.

42. On or about February 7, 2012, at a TD Bank branch in Morrisville, Pennsylvania, an individual known to the grand jury deposited into the TD Bank checking account of A.T. ending in 0629 a counterfeit check of “Goldman & Warshaw” drawn on Lakeland Bank, dated February 3, 2012, check number 071753, in the amount of \$12,482.27, made payable to A.T., and simultaneously withdrew \$8,683.58 cash from the TD Bank checking account of A.T. ending in 0629. At the time the individual withdrew this cash, the individual presented a driver’s license in A.T.’s name but containing the individual’s photograph.

43. On or about February 7, 2012, at the TD Bank Chestnut Hill branch in Philadelphia, Pennsylvania, an individual known to the grand jury attempted to withdraw \$4,000 cash and succeeded in withdrawing \$1,600 cash from the TD Bank checking account of A.T. ending in 0629. At the time the individual withdrew this cash, the individual presented a driver’s license in A.T.’s name but containing the individual’s photograph.

44. On or about February 7, 2012, at the TD Bank branch at 15<sup>th</sup> Street and JFK Boulevard in Philadelphia, Pennsylvania, an individual known to the grand jury attempted to withdraw \$4,000 cash and succeeded in withdrawing \$3,000 cash from the TD Bank checking account of A.T. ending in 0629. At the time the individual withdrew this cash, the individual presented a New Jersey driver’s license in A.T.’s name but containing the individual’s photograph.

45. On or about February 7, 2012, at a TD Bank branch in Bensalem, Pennsylvania, an individual known to the grand jury cashed against the TD Bank checking account of A.T. ending in 0629 a counterfeit check of “Goldman & Warshaw,” drawn on Lakeland Bank, dated February 3, 2012, check number 071802, in the amount of \$7,500, made payable to A.T. At the time the individual cashed this check, the individual presented a driver’s

license in A.T.'s name but containing the individual's photograph.

46. On or about February 14, 2012, at the TD Bank City Hall branch in Philadelphia, Pennsylvania, an individual known to the grand jury attempted to withdraw \$5,000 cash and succeeded in withdrawing \$4,798.58 cash from the TD Bank checking account of A.T. ending in 0629. At the time the individual withdrew this cash, the individual presented a New Jersey driver's license in A.T.'s name but containing the individual's photograph.

47. On or about February 15, 2012, at the TD Bank City Hall branch in Philadelphia, Pennsylvania, an individual known to the grand jury attempted to withdraw \$7,000 cash from the TD Bank checking account of A.T. ending in 0629. At the time the individual attempted to withdraw this cash, the individual presented a New Jersey driver's license in A.T.'s name but containing the individual's photograph.

**TD Bank Checking Account of L.C., Account Number Ending in 1878**

48. On numerous occasions on September 21, 2011, defendant PATRICIA LIGHTSEY, then an employee of TD Bank, accessed the account and personal information L.C., the account holder of a TD Bank checking account ending in 1878, which defendant LIGHTSEY provided without authority to a person unknown to the grand jury prior to February 17, 2012.

49. On or about February 17, 2012, at a TD Bank branch in Silver Spring, Maryland, an individual known to the grand jury withdrew \$5,000 cash from the TD Bank checking account of L.C. ending in 1878. At the time the individual withdrew this cash, the individual presented a South Carolina driver's license in L.C.'s name but containing the individual's photograph.

**TD Bank Checking Account of Westminster Mayfair Presbyterian Church,**

**Account Number Ending in 6655**

50. On numerous occasions between April 26, 2011 and August 1, 2011, defendant PATRICIA LIGHTSEY, then an employee of TD Bank, accessed the account and personal information of Westminster Mayfair Presbyterian Church, the account holder of a TD Bank checking account ending in 6655, which defendant LIGHTSEY provided without authority to a person unknown to the grand jury prior to March 28, 2012.

51. On or about March 28, 2012, at a TD Bank branch in Rockaway, New Jersey, an individual unknown to the grand jury opened up a TD Bank checking account in the name of "Adam King," ending in 4152.

52. On or about March 29, 2012, at a TD Bank branch in Rockaway, New Jersey, an individual unknown to the grand jury deposited into the TD Bank checking account in the name of "Adam King" ending in 4152 a counterfeited check of Westminster Mayfair Presbyterian Church, drawn on the TD Bank checking account of Westminster Mayfair Presbyterian Church ending in 6655, made payable to "Adam King," dated March 28, 2012, check number 3271, in the amount of \$2,611.48, and simultaneously withdrew \$811.48 cash from the TD Bank checking account of "Adam King" ending in 4152. At the time the individual deposited this check and withdrew this cash, the individual presented a driver's license in the name of "Adam King" containing the individual's photograph.

53. On or about April 2, 2012, at a TD Bank branch in Hazlet, New Jersey, an individual unknown to the grand jury cashed a counterfeited check of Westminster Mayfair Presbyterian Church, drawn on the TD Bank checking account of Westminster Mayfair Presbyterian Church ending in 6655, made payable to "Adam King," dated March 30, 2012,

check number 3275, in the amount of \$4,642.38. At the time the individual cashed this check, the individual presented a driver's license in the name of "Adam King" containing the individual's photograph.

54. On or about April 3, 2012, at a TD Bank branch in Old Bridge, New Jersey, an individual unknown to the grand jury deposited into the TD Bank checking account in the name of "Adam King" ending in 4152 a counterfeited check of Westminster Mayfair Presbyterian Church, drawn on the TD Bank checking account of Westminster Mayfair Presbyterian Church ending in 6655, made payable to "Adam King," dated April 3, 2012, check number 3278, in the amount of \$6,372.33, and simultaneously withdrew \$2,000 cash from the TD Bank checking account of "Adam King" ending in 4152. At the time the individual deposited this check and withdrew this cash, the individual presented a driver's license in the name of "Adam King" containing the individual's photograph.

All in violation of Title 18, United States Code, Sections 1344 and 2.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 9, 2011, in the Eastern District of Pennsylvania, and elsewhere, defendants

**PATRICIA LIGHTSEY  
and  
JAMES HULL,**

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name of F.G. and the TD Bank account number ending in 6011, during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.



**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about September 10, 2011, in the Eastern District of Pennsylvania, and elsewhere, defendants

**PATRICIA LIGHTSEY  
and  
JAMES HULL,**

knowingly and without lawful authority, possessed and used, and aided and abetted the possession and use of, a means of identification of another person, that is, the name of T. L., and the TD Bank account number ending in 6327, during and in relation to bank fraud.

In violation of Title 18, United States Code, Sections 1028A(a)(1), (c)(5), and 2.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Section 1344, as set forth in Counts One through Three of this indictment, defendant

**PATRICIA LIGHTSEY  
and  
JAMES HULL**

to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including but not limited to \$170,820 in United States currency (money judgment)

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third Party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982(a)(2)(A)

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**ZANE DAVID MEMEGER**  
**United States Attorney**